



U.S. Department of Justice

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Southern District of New York*

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April 23, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's Order dated April 21, 2021, which directed the Government to submit any requests for redaction of information contained in filings regarding the defense's proposed Rule 17(c) subpoena. (Dkt. No. 226). After reviewing the relevant filings, the Government seeks a limited number of redactions, which are narrowly tailored to protect the privacy interests of third parties. In particular, the Government respectfully requests that the Court permit the redaction of the names and identifying information of particular third parties referenced in the defense's response to the objections of Boies Schiller Flexner LLP ("BSF") to the defense's proposed Rule 17(c) subpoena, BSF's reply, and the April 19, 2021 joint letter addressing the redactions to those same documents. Today the Government is submitting to the Court by email its proposed redactions to those documents, which the Government respectfully requests be filed under seal.

These proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although these documents are judicial documents that are subject to the common law presumption of access, the

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proposed redactions are narrowly tailored to protect the privacy interests of third parties referenced in the documents. These redactions are thus consistent with similar, tailored redactions permitted by the Court in this case to protect the privacy interests of third parties. Accordingly, the Government respectfully requests that the Court adopt the proposed redactions.

The Government has conferred with defense counsel and counsel from BSF, both of whom indicated that they take no position on the Government's redaction requests.

Respectfully submitted,

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Cc: All Counsel of Record (By ECF)